

HONORABLE LAUREN J. KING

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

RENATA MENDENHALL,

Plaintiff,

vs.

RELIANCE STANDARD LIFE INSURANCE
COMPANY, a foreign corporation,

Defendant.

Case No.: 2:21-CV-00759 LJK

**DECLARATION OF AARON I. ENGLE
IN SUPPORT OF PLAINTIFF'S REPLY
TO DEFENDANT'S OPPOSITION TO
PLAINTIFF'S MOTION TO COMPEL**

**NOTE ON MOTION CALENDAR:
MARCH 4, 2022**

1. I am the attorney representing the Plaintiff in this action, Renata Mendenhall.

2. I am competent, have personal knowledge of the matters set forth below, and will so testify if called upon to do so.

3. While Mr. Torrence is the only attorney to file a notice of appearance on this case, Mr. Joshua Bachrach, a partner in the law firm, has been assisting on this case. The first contact from the Defendant's counsel, was from Mr. Bachrach who informed Plaintiff's counsel by email, dated July 14, 2021, that his firm represents the Defendant and requesting an extension to file an Answer.

4. By email, dated July 23, 2021, Mr. Torrence informed Plaintiff's counsel that he would be working with Mr. Bachrach on this matter.

6. The internal claims handling documentation only runs from *AR0034 to AR0166* (132 pages). Attached as Exhibit 1 is the Claim Diary Log Report identifying employees by abbreviation.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE
STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

Executed this 4th day of March 2022.

/s/ Aaron I. Engle
AARON I. ENGLE